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Ecological Services, Pacific Region  
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911 NE 11th Avenue  
Portland, OR 97232

RE: Peer-review of Proposed Rule to List the West Coast Distinct Population Segment of Fisher

Dear Dr. Zwartjes,

Thank-you for the opportunity for me to provide a peer-review of the Proposed Rule to List the West Coast Distinct Population Segment of Fisher and the Draft Fisher Species Report. I am not overly familiar with the regulatory framework in place in the USA, so the majority of my comments pertain to minor questions regarding interpretations on ecological relationships of fishers, which is more my speciality.

The Fisher Species Report was exceptionally well prepared, concise, and a thorough summary and synthesis of known information on the ecology of fishers and the expected impacts of stressors on the viability of the population within the West Coast DPS area. The descriptions, analyses, and findings appeared to be accurate, logical, and supported by data and our current understanding of fisher ecology. As such, my comments on this document are fairly minimal and pertain primarily to the ecological summary.

Generally, it appeared that the assessments of timing, scope, and severity of the stressors that were considered were appropriate, although my lack of familiarity with the assessment area limits my ability to adequately assess of these relationships.

It was interesting to me that there were not any forecasted improvements in things affecting fisher populations (only stressors that would reasonably predict losses). Are there no circumstances under which changes in the stressors have a beneficial effect on fisher populations?

I am not overly familiar with the ecology of northern spotted owls, as they don't co-occur with fishers at all in British Columbia. Thus, I found the reliance that good owl habitat equalled good fisher habitat a bit curious. Surely the 2 species have different habitat needs? E.g., fishers have reproductive dens that are probably quite different than owls, and probably occur in different tree species and sizes.

I'm not sure how relevant it is to the ecosystems in the assessment areas, but in my experience, fishers are actually very well adapted to a mosaic of structural stages that result from normal fire intervals, particularly in central British Columbia and the boreal forest. This would suggest that having extensive tracts of old growth might not be the best for fishers, which is what this document tends to lean towards. I think that recognizing that fishers typically occur in a landscape with a mosaic of stages would be good.

Minor comments:

- Pg. 21. Why is the habitat model shown in Figure 3 so inconsistent with that found in Lewis and Hayes 2004?
- Pg 24 - Fishers occur in Nunavut or on Prince Edward Island, so technically, fishers don't occur in all Canadian provinces and territories.
- Pg 28 – given the recent reclassification of North American martens, shouldn't the martens in the West Coast DPS area be Pacific martens (*Martes caurina*)?
- Pg 55, Fragmentation section could incorporate results from Sauder et al. 2014. Any historic estimate of how much of the area would actually be occupied by fishers? Presumably, not all of it.
- Pg 56 – Low-intensity fires can be an important source of infection courts (fire scars) that can actually enhance the rate of cavity formation in trees (Weir et al. 2012).
- Pg 72. I don't think we said that MPB mortality was bad for fishers, only that the salvage harvest wasn't good. In Weir and Corbould 2010, we actually say this exactly.
- Pg 89. Why change from reporting ha as the unit of measure to reporting acres?

I hope that you find this review to be useful. Best of luck with moving this forward.

Sincerely,



Richard D. Weir, R.P.Bio.  
Carnivore Conservation Specialist